



California Regional Water Quality Control Board Lahontan Region

Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

November 13, 2002

Goodyear K. Walker
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

COMMENTS ON THE DRAFT ENVIRONMENT IMPACT REPORT (DEIR), STATE CLEARINGHOUSE (SCH) NO. 2002101069, EI PASO NATURAL GAS PIPELINE 1903 PROJECT

California Regional Water Quality Control Board (Board) staff has reviewed the referenced DEIR, dated October 15, 2002, for the proposed El Paso Natural Gas Conversion 1903 project. This letter summarizes statements contained in the DEIR, with Board staff comments following.

Project Description

The proposed project by El Paso Pipeline Company is to convert about 303 miles of existing 30 inch pipe from crude oil transport to natural gas transport. The line will connect with existing natural gas lines at three locations in Arizona and California. Internal cleaning of the pipeline has been completed. El Paso plans to install and/or replace approximately 5,000 feet of pipeline in several small sections where the pipe has suffered some damage. El Paso also wishes to relocate approximately 3,400 feet of pipeline at 3 fault crossings to improve separation from other adjacent gas pipelines. This will consist of one change of 1,800 feet and two changes of approximately 800 feet each. With the exception of the three pipeline tie-in locations, all construction activities, approximately 110 total, will take place within the original 100-foot construction corridor. Most activities will require approximately 300 feet in length for disturbance.

DEIR Comments

1. Land Use and Planning

If the work encompasses over five acres (one acre of construction after March 2003) of soil disturbance, an NPDES General Construction Stormwater Permit and a Stormwater Pollution Prevention Plan will be required. This permit is accessible on the State Board web-site at (<http://www.swrcb.ca.gov>). Board staff request a Stormwater Pollution Prevention Plan be prepared and implemented during site activities. Best Management Practice must be used to mitigate project impacts.

This comment is addressed in the *Regulatory Setting* section of *Hydrology and Water Quality* (Section 4.5.2).

Mr. Walker

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November 13, 2002

2. Hydrology and Water Quality

Implementation of the proposed Project will use water allotments for hydrostatic testing. We understand that no open cut stream crossings will occur as the pipeline is in place.

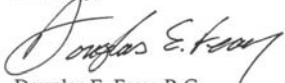
Water quality could be degraded from surface runoff as a result of increased erosion from construction activities. Board staff request that erosion control measures be implemented. Any disturbance of drainage paths should be avoided, if at all possible, or alternatively drainage patterns should not be changed. Drainage areas disturbed by construction activities shall be stabilized by an appropriate stabilization method. Water used for hydrostatic testing should be free of chlorine or other contaminants. Discharge of test water should not cause a nuisance such as flooding or impact to wildlife.

3. Hazards and Hazardous Materials

Potential hazard to the public and the environment may result from spills from damaged areas of the crude oil pipeline or from hazardous materials, such as hydraulic fluid, motor oil, etc. Leakage from the current pipeline may have occurred. Visual observations for signs of leakage to the ground should be made during the construction of the project. Any observed discharges from the pipe should be cleaned up.

We request a copy of the route photo alignment sheet if available upon project completion. If you have any questions, please telephone me at (760) 241-7353, or Cindi Mitton at (760) 241-7413.

Sincerely,



Douglas E. Feay, R.G.
Associate Engineering Geologist

cc: Becky Frank
State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

YADF/rp EIR letter 10-29-02 El Peso.doc

This comment is addressed in the *Regulatory Setting* section of *Hydrology and Water Quality* (Section 4.5.2).

This comment is addressed in the *Impact Analysis and Mitigation* section of *Hazards and Public Safety* (Section 4.6.4)



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630



Gray Davis
Governor

November 19, 2002

Mr. Goodyear K. Walker
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, California 95825

NOTICE OF PREPARATION OF A JOINT ENVIRONMENTAL IMPACT REPORT /
ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED EL PASO LINE NO. 1903
PIPELINE CONVERSION PROJECT - (SCH # 2002101069)

Dear Mr. Walker:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation (NOP) of a joint Environmental Impact Report/Environmental Assessment (EIR/EA) for the above-mentioned Project.

Based on the review of the document, DTSC's comments are as follows:

- 1) The draft EIR/EA needs to identify and determine whether current or historic uses have resulted in any release of hazardous wastes/substances at the site.
- 2) The draft EIR/EA needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the draft EIR/EA needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR/EA should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation and the government agency to provide appropriate regulatory oversight.
- 4) An environmental assessment should be conducted in the project area to evaluate whether the project area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste/materials. Potential hazard to the public or the environment through routine transportation, use, disposal or release of hazardous materials should be discussed in the draft EIR/EA.

Responses to these comments are included in *the Impact Analysis and Mitigation* section of *Hazards and Public Safety* (Section 4.6.4)

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- 5) Any hazardous wastes/materials encountered during construction should be remediated in accordance with local, state, and federal regulations. Prior to initiating any construction activities, an environmental assessment should be conducted to determine if a release of hazardous wastes/substances exists at the site. If so, further studies should be carried out to delineate the nature and extent of the contamination. Also, it is necessary to estimate the potential threat to public health and/or the environment posed by the site. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies rather than excavation of soil prior to any assessments.
- 6) Investigate the presence of lead paints or asbestos containing material (ACMs). If the presence of lead and ACMs are suspected, proper precautions should be taken during removal/excavation/demolition activities. Additionally, the contaminants should be remediated in compliance with the California environmental regulations.
- 7) If during construction of the project, soil and/or groundwater contamination is suspected, suspend construction in the area and implement appropriate Health and Safety procedures. If it is determined that contaminated soil and/or groundwater exist, the draft EIR/EA should identify how any required investigation and/or remediation will be conducted and which government agency will provide appropriate regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

If you have any questions regarding this letter, please contact Ms. Rania A. Zabaneh, Project Manager at (714) 484-5479.

Sincerely,



Haissam Y. Salloum, P.E.
Unit Chief
Southern California Cleanup Operations Branch
Cypress Office

cc: see next page

Mr. Goodyear K. Walker
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cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

| <input checked="" type="checkbox"/> AFMC <input type="checkbox"/> <input type="checkbox"/> CONCEPT <input type="checkbox"/> DESIGN <input type="checkbox"/> FINAL DWG NO. | | REVIEW COMMENTS PAGE 1 OF 1 PAGE(S) | |
|--|------|---|-----------------------------|
| PROJECT | | NOI Prepare EIR/EA for Proposed El Paso Line Pipeline Conversion Project | |
| LOCATION | | Edwards AFB CA | |
| A/E | | ENGINEERING SPECIALTY & ORGANIZATION OR AREA OF EXPERTISE & ORGANIZATION | DATE |
| El Paso Natural Gas Company | | Real Estate Office and Environmental Management Office | 21 Nov 02 |
| DWG NO. | | Phyllis Miller 661-277-3415 | |
| OR PAGE NO. | ITEM | COMMENTS | ACTION BY REVIEW CONF |
| | 1 | Edwards AFB reserves the right to determine whether the base will participate as a cooperating agency in the preparation of the EIR/EA. | PROJECT ENGINEER |
| | 2 | Additional requests for permanent Right-of-Way lands on Edwards AFB need to be identified. Also, additional Edwards AFB lands needed for temporary workspace or road access need to be identified. | |
| | 3 | An Environmental Baseline Survey for this project may be required for Edwards AFB lands. | |
| | 4 | An approved digging permit is required prior to any trenching activities on Edwards AFB. An approved welding permit is required prior to any welding activities on Edwards AFB. | |
| | 5 | El Paso shall schedule a pre-construction meeting with the Work Management Office, Real Office, at least 30 days prior to the start of construction on Edwards AFB property to discuss construction, environmental, safety and security requirements. | |
| | 6 | Construction activity may encounter ordnance associated with past training and test activities. Prior to excavation, areas will be cleared using company qualified ordnance disposal personnel. | |
| | 7 | Explosive materials are not authorized for storage on Edwards AFB. | |
| | 8 | Notify Edwards AFB if any of the pipeline on Base needs to be replaced and if so, where the segments are located and where the ground disturbance would occur. | |
| | 9 | Areas not previously disturbed and are planned to be disturbed may require cultural resource surveys. | |
| | 10 | Identify any locations on Base where hydrostatic testing would occur. | |
| | 11 | Identify any new valves to be installed on Base, how many, where they will be located and how much disturbance around each valve. | |
| | 12 | Provide information on what mitigation is planned for the Federal and State threatened desert tortoise and State listed threatened Mohave ground squirrel? | |
| | 13 | A portion of the original pipeline corridor on Base has been recently revegetated. Provide locations of segments that will require replacing. | |

For construction of the Project no works sites are planned on Edwards Air Force Base land.

November 7, 2002

Goodyear K. Walker
California State Lands Commissions
100 Howe Ave., Suite 100 South
Sacramento, CA 95825

Re: CSLC EIR No. 719
BLM Serial No. CACA-42649
CSLC Files: WP 6783; W 30141
SCH #2002101069
El Paso Line No.1903 Pipe conversion Project from crude oil
transport to Natural Gas transport.

Dear Mr. Goodyear K. Walker
State Enviroinmental Scientist

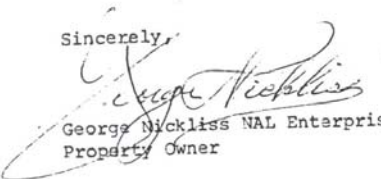
There are some questions in regards to the issue stated above: Also some
comments relating to same.

(1) Will there be an Offer of consideration of payment by El Paso Natural
Gas Company? And what is a fair price for such use?

- (a) For this conversion on my property
- (b) For use of Gas in lieu of oil
- (c) For change of Lessee
- (d) For change in rules of safety limitations and enviroinmental
requirements
- (e) Or any other elements of considerations in regards to the use
of Gas instead of Oil transported through these existing pipe
lines, in said enviroinment.

Please respond as designated by your notice as soon as possible. It will be
appreciated. Or call me at 310-331-1408

Sincerely,


George Nickliss NAL Enterprises
Property Owner

Easement issues and compensation for change in use (from oil
to natural gas) needs to be negotiated with EPNG.